

BEFORE THE TENNESSEE REGULATORY AUTHORITY
AT NASHVILLE, TENNESSEE

IN RE: PETITION FOR AN)
INVESTIGATION AND/ OR SHOW)
CAUSE ORDER TO DETERMINE JUST)
AND REASONABLENESS OF RATES)
CHARGED BY BELL SOUTH)
TELECOMMUNICATIONS, INC.)

MAY 26 AM 9 30


DOCKET NO. 98-00021
EXECUTIVE SECRETARY

MOTION TO AMEND

Comes the Consumer Advocate Division and moves to amend its Complaint or Petition to allege alternatively, the following:

1. That BellSouth alleges that it is not currently operating under Tenn. Code Ann. § 65-4-101 (g) (1) and as a result the company does not qualify for a price regulation plan.
2. That BellSouth has no current fair return meeting the standards of Tenn. Code Ann. § 65-4-101 (g) and that an earnings investigation is warranted because of the excessive earnings of the company which cause more than just and reasonable rates.
3. That Tenn. Code Ann. § 65-4-101 (g) (2) is not applicable to BellSouth because that sub-section is only applicable to companies which were not subject to a rate of return range in their last order.
4. In the alternative, Tenn. Code Ann. § 65-4-101 (g) (2) restores BellSouth to Tenn. Code Ann. § 65-4-101 (g) (1) status and as a result BellSouth is presently operating pursuant to alternative regulation.

Respectfully Submitted,



L. Vincent Williams

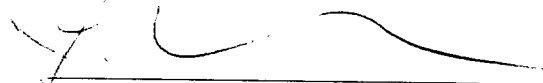
CERTIFICATE OF SERVICE

I hereby certify that a copy of this Motion was served on the parties listed below by mail on this the 20th day of May 1998.

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